

**EXHIBIT B**

**Proposed Order**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK  
SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

**ORDER AMENDING PRIOR RETENTION ORDER OF  
RETAIN ROBBINS, RUSSELL, ENGLERT, ORSECK, UNTEREINER & SAUBER LLP  
AS SPECIAL COUNSEL**

Upon the Application of Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC and the estate of Bernard L. Madoff to amend the prior order of this Court that approved the retention of Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP (“Robbins Russell”) as special counsel, and upon the declaration of Mr. Roy T. Englert, Jr. submitted in connection therewith; and due and proper notice having been given under the circumstances of this case, and after due deliberation,

**IT IS HEREBY ORDERED THAT:**

1. The Application is **GRANTED**.
2. The Court finds that Robbins Russell is deemed disinterested under 15 U.S.C.

§ 78eee(b)(6)(B).

3. The Trustee is authorized to expand the retention of Robbins Russell as special counsel to the Trustee as provided in the Application.

Dated: \_\_\_\_\_, 2020  
New York, New York

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HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE